

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**DECLARATION OF JENNIFER A. GOLINVEAUX IN SUPPORT OF
COX'S OPPOSITION TO PLAINTIFFS' MOTION FOR SANCTIONS**

I, Jennifer A. Golinveaux, hereby declare:

1. I am a partner with the firm of Winston & Strawn LLP, attorneys of record for Defendants Cox Communications, Inc. and CoxCom, LLC (collectively, "Cox"). I have personal knowledge of all facts stated in this declaration, and if called upon as a witness, I could and would competently testify thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the February 15, 2019 hearing on Plaintiffs' Motion to Compel before this Court.

3. I informed Plaintiffs before they filed their motion for sanctions that Cox's customer billing report was taking longer than expected because unexpectedly a portion of the data had to be retrieved from backup tapes, but that Cox expected to produce the report this week. Cox did just that and is producing the report today. A true and correct copy of my email correspondence with Plaintiffs' counsel dated March 28-29, 2019 is attached hereto as **Exhibit B**.

4. Plaintiffs served their Rule 30(b)(6) notice on Cox late the evening of Wednesday,

March 20, noticing 49 detailed topics for deposition. They did so without any advance notice to Cox whatsoever, and noticed the deposition to commence seven business days later on April 1 in Washington D.C. As I advised plaintiffs, April 1 was also the week of the spring break holiday for much of the country, and all but one of Cox's anticipated Rule 30(b)(6) designees were traveling that week, several out of the country. A true and correct copy of my email correspondence with Plaintiffs' counsel dated March 20-22, 2019 is attached hereto as **Exhibit C**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3rd day of April, 2019 in San Francisco, California.

/s/ Jennifer A. Golinveaux
Jennifer A. Golinveaux